

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
HATTIESBURG DIVISION**

UNITED STATES OF AMERICA,
Respondent-Plaintiff

Crim. No. 2:16-cr-00007-KS-MTP-1

Hon. Keith Starrett

v.

CHARLES BOLTON,
Petitioner-Defendant.

MOTION TO STAY SELF-REPORTING DATE

Charles Bolton, through Counsel, motions this Court, to permit filing of the Confidential Memorandum In Support Of The Motion To Stay Reporting Date *under seal*.. The confidential memorandum accompanying the instant Motion contains sensitive medical information protected by *Federal Privacy Act and Health Insurance Portability and Accountability Act (HIPAA)* 45 C.F.R. 160, 162,164 that bars release of this information to the public.

So that the Court can properly review and rule on the Motion to Stay Self-Reporting Date which is supported by the medical information contained in the confidential memorandum, Charles Bolton hereby moves to file the confidential memorandum with exhibits under seal. The confidential memorandum has been submitted for in camera review pending a proposed order to seal.

Respectfully Submitted,
/s/Sharon Henderson
Sharon Henderson
Counsel for Charles Bolton
4/21/2017

Presented By:

Sharon Henderson MSB 8898
5352 Executive Place Ste 9
Jackson, MS 39206
Tel. 601-573-7756
Fax:601-510-1980
Sharonhenderson98@gmail.com

CERTIFICATE OF SERVICE

I hereby certify that the attached Motion To Stay Self Reporting Date has been served this 21st day of 2017 by the Court's electronic filing system on the following parties: Fred Harper, United States Attorney's Office, fred.harper@usdoj.gov; and Sharon Lieberman, United States Attorney's Office, Sharon.lieberman@usdoj.gov and all counsel of record.

Presented By:

/s/Sharon Henderson

Sharon Henderson
5352 Executive Place
Jackson, MS 39206
Tel. 601-573-7756
Fax: 601-510-1980
sharonhenderson98@gmail.com